

Adur & Worthing Equality Impact Assessment (EIA) Template Trial - 2020/21

We want to trial the use of this template when it is appropriate, for example when making significant decisions that may impact disproportionately on certain protected communities. As part of our Good Service Standard we are also seeking to embed these equality impact assessment principles into everyday service planning and delivery. You may therefore only need to complete a template occasionally, but you should always be working to achieve its general principles and intended outcomes.

Our Equality Statement

Adur District and Worthing Borough Councils are committed to increasing inclusion and providing equality of opportunity in all our activities and to ensuring that discrimination does not occur. We will strive for a workforce that reflects the diversity of the local community in order that our services are provided appropriately and the Councils benefit from a wealth of experiences. The Councils will involve the wider community in our decision-making processes and use our influence to progress equality and inclusion issues in the Adur District and Worthing Borough.

To achieve our vision for inclusion and equality we will lead by example, we will listen to our communities and we will seek to work in collaboration with others. As part of this and as set out in Platforms of Our Places; Going Further plan, we will work to establish a platform that will aim to unlock the energy and unleash the power of people in the community to run and improve their own lives and the places they live. We will undertake this work with care, support and respect, recognising the reality of disadvantage and discrimination experienced by many communities.

Equality Impact Assessments (EIAs)

EIAs enable us to consider all the information about a service, policy or strategy from an equalities perspective and then identify actions to support delivery towards our equality objectives and our statutory duties. The EIA process specifically aims to:

- Get the best outcomes for our staff and residents
- Analyse how all our work as councils might impact differently on different groups.
- Help us make good decisions and evidence how we have reached these decisions

EIAs are therefore a practical way in which we can achieve our Good Service standard, where we have pledged to improve our services and make them accessible to everyone. The EIA template we are trialling in 2020/21 is suitable for a number of settings, including policy development, organisation management and service redesign. The template is made up of a series of tables and numbered guidance notes to guide and support you through the approach. We will evaluate the use of the template towards the end of 2021.

Part 1. Equality Impact Assessment (EIA) Template

First, consider whether you need to complete an EIA. Is an EIA needed and is there another way to evidence assessment of impacts. See guidance note (1) on the legislative context and guidance note (2) on considerations when planning an EIA.

Title of EIA (3)	Staff Travel Policy
Team/Department (4)	Corporate
Focus of EIA (5)	<p>The staff travel policy is published in Summer 2021. Since Covid, many of our staff have experienced profound changes to their working lives, many working from home for a large proportion of their time with vastly reduced commuting mileage, and many site visits successfully undertaken virtually rather than in person. Our WorkspacesAW programme aims to build a future working model that captures the benefits of these changes, while providing upgraded office accommodation (at the Town Hall) that better suits a new “blended” model of office and working from home. The staff travel policy is an integral part of these changes.</p> <p>We want to support individuals and teams to review their travel needs and take up the new options available, reducing costs and environmental impact - and turning travel into something that makes people healthier and happier.</p> <p>This is an EIA for the Staff Travel Policy on staff impacts primarily around business travel, but will also be relevant for commuting too. The focus for the policy is to encourage and support employees towards a more low carbon and active approach to travel.</p>

2. Update on previous EIA and outcomes of previous actions

If there is no previous EIA, or EIA equivalent or this is an assessment of a new service, then simply write 'not applicable'.

What actions did you plan last time? (List them from the previous EIA)	What improved as a result? What outcomes have these actions achieved?	What <u>further</u> actions do you need to take? (add these to the Action plan below)
Not applicable		

3. Review of information, equality analysis and potential actions

In this section we consider the various protected characteristics groups from the Equality Act 2010 (6)

What do you know? (7) Summary of data about service-user / resident / and/or staff feedback.	What do people tell you? (8) Summary of service-user / resident / and/or staff feedback	What does this mean? (9) <ul style="list-style-type: none"> ● Impacts identified from data and feedback (actual and potential) 	What can you do? (10) <ul style="list-style-type: none"> ● To advance equality of opportunity, ● To eliminate discrimination, and ● To foster good relations

<p>Age¹</p>	<p>Younger people may be less likely to have suitable home accommodation for office use (e.g. living with parents or in small flats) so might have to primarily commute to work in the office, therefore incur more commuting costs than people able to work from home (although people working from home are likely to incur higher utility costs).</p> <p>Younger people might not have equipment they need for active travel.</p> <p>Older people might not feel as able to undertake active travel.</p>	<ul style="list-style-type: none"> • Data Analysis completed of job roles not able to work from home (see attached appendix 1). Younger workforce not impacted by this change according to data 	<ul style="list-style-type: none"> • Individual line managers to discuss in 1:1s and monitor • Promote widely the range of sustainable travel options, including cycle to work loan scheme and free use of Donkey Bikes, plus bike confidence training. • Promote discounted public transport via the EASIT scheme. • Conduct regular feedback sessions to understand barriers and challenges towards the Sustainable Travel Hierarchy and put measures in place to support employees further.
<p>Disability²</p>	<p>These staff might need to continue to drive their own car and to park in a space near to the office.</p>	<ul style="list-style-type: none"> • Data analysis shows that there are 12 employees with disabilities known to the council • 2 Badge holders within the council 	<ul style="list-style-type: none"> • The Councils will endeavour to identify and promote appropriate parking facilities near to the office for staff requiring car parking due to a disability or illness. The intranet will be

¹ **Age:** People of all ages

² **Disability:** A person is disabled if they have a physical or mental impairment which has a substantial and long-term adverse effect on their ability to carry out normal day-to-day activities. The definition includes: sensory impairments, impairments with fluctuating or recurring effects, progressive, organ specific, developmental, learning difficulties, mental health conditions and mental illnesses,

	<p>Only a few spaces for blue badge holders are available due to WICC development.</p> <p>Some won't have a blue badge, but will still want to drive and need to park near to the office.</p> <p>These staff might not feel able to / want to take up incentives around active travel.</p> <p>These staff might not feel comfortable / able to drive in a car that is not their own, so pool cars won't be an option for them.</p> <p>The flexibility of being able to work from home or other locations will reduce travelling needs. But some posts may be unsuitable for home working or home working may be on a part time basis only.</p>		<p>updated to include blue badge parking guidelines to reflect all day parking on the street.</p> <ul style="list-style-type: none"> ● Review prioritisation and implementation of recommendations from accessibility study (first site visit 02.06.21). ● Where required seek advice from the Councils' Health & Safety team or Occupational Health ● Individual assessed needs - Accessibility Assessment being commissioned.
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produced by injury to the body or brain. Persons with cancer, multiple sclerosis or HIV infection are all now deemed to be disabled persons from the point of diagnosis.

<p>Gender reassignment³</p>	<p>Gender neutral toilets and/or changing facilities may be preferred by some Trans or non-gender binary people.</p>	<ul style="list-style-type: none"> • Disabled toilet facilities in Portland House and Town Hall are gender neutral and we will consult further on identifying these as Accessible Unisex Toilets. There are no plans to introduce additional gender neutral facilities. 	<ul style="list-style-type: none"> • Continue to monitor.
<p>Pregnancy and maternity⁴</p>	<p>The introduction of greater flexible working opportunities will give women who are pregnant more flexibility to work around medical appointments and potentially be able to work around any issues (i.e. morning sickness etc.).</p> <p>Pregnant women might feel more comfortable driving their own car compared to taking public transport or active travel.</p>		<ul style="list-style-type: none"> • New and expectant mother risk assessments that are carried out should include discussion about travel options.

³ **Gender Reassignment:** In the Act a transgender person is someone who proposes to, starts or has completed a process to change his or her gender. A person does not need to be under medical supervision to be protected

⁴ **Pregnancy and Maternity:** Protection is during pregnancy and any statutory maternity leave to which the woman is entitled.

Religion or belief⁵	No impact identified.		
Sex/Gender⁶	<p>Higher proportion of part-time staff are female and blended working may not be feasible if living in smaller accommodation (see Lone Parent) so might have to primarily commute to work in the office, therefore incur more commuting costs than people able to work from home (although people working from home are likely to incur higher utility costs).</p> <p>Some female staff felt concerned of using the bike lockers in the winter due to the area being dark and feeling unsafe.</p>	<ul style="list-style-type: none"> ● Data analysis completed see appendix 1. ● No concern - higher number of male full time employees impacted for not working from home. ● Only 18 Female part time employee impacted for not working from home due to their roles servicing the community 	<ul style="list-style-type: none"> ● Continue to monitor in normal Management Information reporting ● Reassess when DSE Assessments have been completed ● Improved bike storage facilities are being looked into as part of the WICC development. In the meanwhile, facilities will be reviewed to ensure all staff feel safe using them. Monitor via staff survey.

⁵ **Religion and Belief:** Religion includes any religion with a clear structure and belief system. Belief means any religious or philosophical belief. The Act also covers lack of religion or belief.

⁶ **Sex/Gender:** Both men and women are covered under the Act.

Sexual orientation⁷	No impact identified		
Marriage and civil partnership⁸	No impact identified		
Community Cohesion⁹	No impact identified		
Other relevant groups¹⁰	<i>See below</i>		
Lone Parents	<p>Parents might be in a routine of dropping children off at childcare/school on the way to work, so they might feel that active travel or public transport won't work for them.</p> <p>Home and flexible working may be beneficial for child care and family commitments:</p>	<ul style="list-style-type: none"> • No data available on the number of employees with carer or parental duties. 	<ul style="list-style-type: none"> • Training to be provided to managers on how to manage these situations to ensure fairness is applied. • Individual line managers to discuss in 1:1s and monitor • Promote widely the range of sustainable travel options, including cycle to work loan

⁷ **Sexual Orientation:** The Act protects bisexual, gay, heterosexual and lesbian people

⁸ **Marriage and Civil Partnership:** Only in relation to due regard to the need to eliminate discrimination.

⁹ **Community Cohesion:** What must happen in all communities to enable different groups of people to get on well together.

¹⁰ **Other relevant groups:** eg: Carers, people experiencing domestic and/or sexual violence, substance misusers, homeless people, looked after children, ex-armed forces personnel, people on the Autistic spectrum etc

	<p>flexible hours will be helpful for school runs and other appointments difficult to arrange outside of traditional working hours.</p>		<p>scheme and free use of Donkey Bikes, plus bike confidence training.</p> <ul style="list-style-type: none"> ● Promote discounted public transport via the EASIT scheme. ● Conduct regular feedback sessions to understand barriers and challenges towards the Sustainable Travel Hierarchy and put measures in place to support employees further.
<p>Carers</p>	<p>These people with caring responsibilities might choose to drive their own car as it gives them more flexibility around parenting/carer needs.</p> <p>Parents might be in a routine of dropping children off at childcare/school on the way to work, so they might feel that active travel or public transport won't work for them.</p> <p>The logistics and realities of being a carer mean home working isn't always possible, many carers are low paid as they are part time workers - but they might need to use a car for their caring duties, plus</p>	<ul style="list-style-type: none"> ● No data available on the number of employees with carer or parental duties. 	<ul style="list-style-type: none"> ● Training to be provided to managers on how to manage these situations to ensure fairness is applied. ● Individual line managers to discuss in 1:1s and monitor ● Promote widely the range of sustainable travel options, including cycle to work loan scheme and free use of Donkey Bikes, plus bike confidence training. ● Promote discounted public transport via the EASIT scheme. ● Conduct regular feedback sessions to understand barriers and challenges towards the Sustainable Travel Hierarchy and put

	<p>incur commuting costs if unable to work from home.</p> <p>Most carers are women - see Gender/Sex.</p>		<p>measures in place to support employees further.</p>
<p>Home Workers</p>	<ul style="list-style-type: none"> • Some posts may be unsuitable for home working even if this is the staff member's preferred option. • There is likely to be a pay disparity, with lower grade roles less likely to be suitable for home working compared to higher paid roles. • These people will be more affected by higher charges in the car park now WICC is closing and/or other commuting costs in general. 	<p>No known incidents of this at this time</p>	<ul style="list-style-type: none"> • Training to be provided to managers on how to manage these situations to ensure fairness is applied. • Individual line managers to discuss in 1:1s and monitor • Promote widely the range of sustainable travel options, including cycle to work loan scheme and free use of Donkey Bikes, plus bike confidence training. • Promote discounted public transport via the EASIT scheme. • Conduct regular feedback sessions to understand barriers and challenges towards the Sustainable Travel Hierarchy and put measures in place to support employees further.

4. List the data, information and/or community feedback that informed your EIA

Title (of data, research or engagement)	Date	Gaps in data	Actions to fill these gaps: who else do you need to engage with? (add these to the Action Plan below, with a timeframe)
Sustrans Survey to inform development of Travel Action Plan: 62% of staff are in the 'contemplation' stage, thinking of changing the way they travel to or at work for one or more of the sustainable travel modes (walking, cycling, public transport or car sharing) –	2019	Need to hear from all staff/update now blended working being brought in.	Conduct another staff survey to understand how to support staff to transition from contemplation stage
Staff Survey June 2020 Staff Survey January 2021	June 2020 January 2021	The surveys did not collate specific equalities data.	Future surveys should include equalities data
Staff travel surveys & consultation	Jun 21	Need to hear from all staff	Continue regular staff surveys to monitor views and challenges

5. Prioritised Action Plan

The Equality Duty is an ongoing duty which means policies must be kept under review. The actions identified below should be incorporated into service or business plans and monitored to ensure they achieve the outcomes identified.

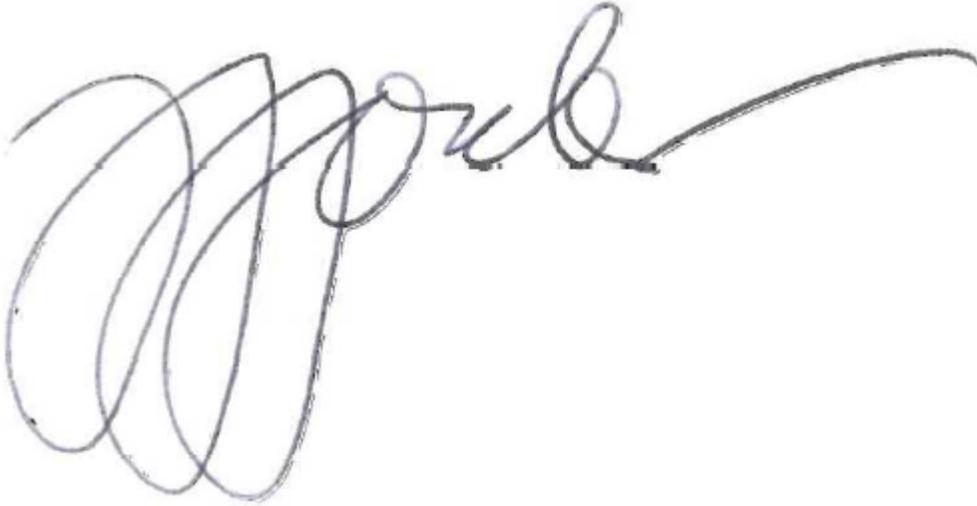
Impact identified and group(s) affected	Action planned	Expected outcome	Measure of success	Timeframe
<p>ALL groups</p>	<ul style="list-style-type: none"> ● Training to be provided to managers on how to manage these situations to ensure fairness is applied. ● Individual line managers to discuss in 1:1s and monitor ● Promote widely the range of sustainable travel options, including cycle to work loan scheme and free use of Donkey Bikes, plus bike confidence training. 	<ul style="list-style-type: none"> ● Employee take up of low carbon and active travel increases. ● Employees unable to take active or low carbon travel are supported ● Managers are more aware of how to best support employees. 	<ul style="list-style-type: none"> ● Employees are aware of all available support for them to move towards active & low carbon travel, where suitable ● Positive conversations between Managers, Employees, HR around the real challenges facing employees and a collaborative approach to address those challenges 	<ul style="list-style-type: none"> ● Ongoing monitoring and support. ● Sustainable Travel Policy will be reviewed annually

	<ul style="list-style-type: none">● Promote discounted public transport via the EASIT scheme.● Expand Enterprise Car Club to allow an increase in usage to cover more of the car based business travel.● Proactively promote Liftshare.com as a car share scheme facilitating staff to easily and intuitively find others to share with.● Conduct regular feedback sessions to understand barriers and challenges towards the Sustainable Travel Hierarchy and put		<ul style="list-style-type: none">● Employees report health & wellbeing benefits as a result of greater levels of active travel	
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	measures in place to support employees further.			
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EIA sign-off:

For the EIA to be final an email must be sent from the relevant people agreeing it or this section must be signed.

Staff member competing Equality Impact Assessment: Chloe Clarke - Sustainability Officer	Date:05/07/21
Head of Service: Francesca Iliffe - Strategic Sustainability Manager	Date:05/07/21
Equality Lead: Jan Jonker - Head of Customer & Digital Services 	Date:09/07/21

EIA Guidance Notes

If this is your first EIA, take some time to read through the notes. If you have any questions please email: equalitieschampions@adur-worthing.gov.uk

1. Our duties in the Equality Act 2010

As a public sector organisation, we have a legal duty (under the Equality Act 2010) to show that we have identified and considered the impact and potential impact of our activities on all people with 'protected characteristics' (age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex, sexual orientation, and marriage and civil partnership). This applies to policies, services (including commissioned services), and our employees. The level of detail of this consideration will depend on what you are assessing, who it might affect, those groups' vulnerability, and how serious any potential impacts might be. We use this EIA template to complete this process and evidence our consideration. The following are the duties in the Act that we must give 'due regard' (pay conscious attention):

- **Avoid, reduce or minimise negative impact** (if you identify unlawful discrimination, including victimisation and harassment, you must stop the action and take advice immediately).
- **Promote equality of opportunity.** This means the need to:
 - Remove or minimise disadvantages suffered by equality groups

- Take steps to meet the needs of equality groups
- Encourage equality groups to participate in public life or any other activity where participation is disproportionately low
- Consider if there is a need to treat some people differently, including more favourable treatment where necessary
- **Foster good relations between people who share a protected characteristic and those who do not.** This means:
 - Tackle prejudice
 - Promote understanding

In addition the following principles, drawn from case law, explain when and how the above duty should be applied:

- **Knowledge:** In working for the councils and reviewing its activities staff must be aware of equalities duties and apply them appropriately to this work.
- **Timeliness:** The duty applies at the time of considering policy options and/or before a final decision is taken – not afterwards.
- **Real Consideration:** The duty must be an integral part of our decision-making and able therefore to influence the process.
- **Sufficient Information:** You must assess what information you have and what is needed to give proper consideration.
- **No delegation:** The councils are responsible for ensuring that any contracted services which provide services on our behalf can comply with the duty, are required in contracts to comply with it, and do comply in practice. It is a duty that cannot be delegated.
- **Review:** The equality duty is a continuing duty. It applies when a policy is developed/agreed, and when it is implemented/reviewed.
- **Proper Record Keeping:** To show that we have fulfilled our duties we must keep records of the process and the impacts identified. Properly used, an EIA can form a key part of this requirement.

2. Do you need to undertake an EIA?

An EIA may or maynot be necessary or appropriate:

- Is the policy, decision or service likely to be relevant to any people because of their protected characteristics?
- How many people is it likely to affect?
- How significant are its impacts?
- Does it relate to an area where there are known inequalities?
- How vulnerable are the people (potentially) affected?

If there are potential impacts on people but you decide not to complete an EIA it is important to document why.

When might you generally complete an EIA:

- When planning or developing a new service, policy or strategy
- When reviewing an existing service, policy or strategy
- When ending or substantially changing a service, policy or strategy
- When there is an important change in the service, policy or strategy, or in the borough or district (eg: a change in population), or at a national level (eg: a change of legislation)

The EIA does not have to be on this template, but must be documented. Wherever possible, build the EIA approach into your usual planning/review processes. When planning your EIAs remember it should be proportionate to:

- The size of the service or scope of the policy/strategy
- The resources involved
- The numbers of people affected
- The size of the likely impact
- The vulnerability of the people affected

The greater the potential adverse impact of the proposed policy on a protected group (e.g. disabled people), the more vulnerable the group in the context being considered, the more thorough and demanding the process is required.

3. Title of EIA: This should clearly explain what service / policy / strategy / change you are assessing **4.**

Team/Department: Main team responsible for the policy, practice, service or function being assessed

5. Focus of EIA: A member of the public should have a good understanding of the policy or service and any proposals after reading this section. Please use plain English and write any acronyms in full first time - eg: 'Equality Impact Assessment (EIA

6. Protected characteristics groups from the Equality Act 2010:

→ **Age:** People of all ages

→ **Disability:** A person is disabled if they have a physical or mental impairment which has a substantial and long-term adverse effect on their ability to carry out normal day-to-day activities. The definition includes: sensory impairments, impairments with fluctuating or recurring effects, progressive, organ specific, developmental, learning difficulties, mental health conditions and mental illnesses, produced by injury to the body or brain. Persons with cancer, multiple sclerosis or HIV infection are all now deemed to be disabled persons from the point of diagnosis.

→ **Gender Reassignment:** In the Act a transgender person is someone who proposes to, starts or has completed a process to change his or her gender. A person does not need to be under medical supervision to be protected.

→ **Pregnancy and Maternity:** Protection is during pregnancy and any statutory maternity leave to which the woman is entitled.

→ **Race/Ethnicity:** This includes ethnic or national origins, colour or nationality, and includes refugees and migrants, and Gypsies and Travellers. Refugees and migrants means people whose intention is to stay in the UK for at least twelve months (excluding visitors, short term students or tourists). This definition includes asylum seekers; voluntary and involuntary migrants; people who are undocumented; and the children of migrants, even if they were born in the UK.

- **Religion and Belief:** Religion includes any religion with a clear structure and belief system. Belief means any religious or philosophical belief. The Act also covers lack of religion or belief.
- **Sex/Gender:** Both men and women are covered under the Act.
- **Sexual Orientation:** The Act protects bisexual, gay, heterosexual and lesbian people
- **Marriage and Civil Partnership:** Only in relation to due regard to the need to eliminate discrimination.
- **Community Cohesion:** What must happen in all communities to enable different groups of people to get on well together.
- **Other relevant groups:** eg: Carers, people experiencing domestic and/or sexual violence, substance misusers, homeless people, looked after children, ex-armed forces personnel, people on the Autistic spectrum etc
- **Cumulative Impact:** This is an impact that appears when you consider services or activities together. A change or activity in one area may create an impact somewhere else

7. What do you know (data and Information): Make sure you have enough data and information to inform your EIA.

- What data, relevant to the impact on protected groups of the policy/decision/service, is available? Consider local sources of data (eg: the JSNA, Local Insight) and national sources where they are relevant.
- What further evidence is needed and how can you get it? (e.g. further research or engagement with the affected groups).
- What do you already know about needs, access and outcomes? Focus on each of the protected characteristics in turn. Eg: who uses the service? Who doesn't and why? Are there differences in outcomes? Why?
- Have there been any important demographic changes or trends locally? What might they mean for the service or function?
- Does data/monitoring show that any policies or practices create particular problems or difficulties for any groups?
- Do any equality objectives already exist? What is current performance like against them?
- Is the service having a positive or negative effect on particular people in the community, or particular groups or communities?

8. What do people tell you (engagement):

You must seek to engage appropriately with those likely to be affected:

- What do people tell you about the services?
- Are there patterns or differences in what people from different groups tell you?
- What information or data will you need from communities?
- How should people be consulted? Consider:
 - ◆ consulting when proposals are still at a formative stage;
 - ◆ explain what is proposed and why, to allow intelligent consideration and response;
 - ◆ allow enough time for consultation;
 - ◆ make sure what people tell you is properly considered in the final decision.
- Try to consult in ways that ensure all perspectives can be considered.
- Identify any gaps in who has been consulted and identify ways to address this.

9. What does this information and feedback mean?

Your EIA should seek to understand the actual and potential impacts.

- The equality duty does not stop decisions or changes, but means we must conscientiously and deliberately confront the anticipated impacts on people.
- Be realistic: don't exaggerate speculative risks and negative impacts.
- Be detailed and specific so decision-makers have a concrete sense of potential effects. Instead of "the policy is likely to disadvantage older women", say if you can, how many or what percentage are likely to be affected, how, and to what extent. Questions to ask when assessing impacts depend on the context. Examples:
 - ◆ Are one or more protected groups affected differently and/or disadvantaged? How, and to what extent? ◆ Is there evidence of higher/lower uptake among different groups? Which, and to what extent?
 - ◆ If there are likely to be different impacts on different groups, is that consistent with the overall objective?
 - ◆ If there is negative differential impact, how can you minimise that while taking into account your overall aims

- ◆ Do the effects amount to unlawful discrimination? If so the plan must be modified.
- ◆ Does the proposal advance equality of opportunity and/or foster good relations? If not, could it?

10. What can you do?

Consider all three aims of the Act: removing barriers, and also identifying positive actions we can take.

- Where you have identified impacts you must state what actions will be taken to remove, reduce or avoid any negative impacts and maximise any positive impacts or advance equality of opportunity.
- Be specific and detailed and explain how far these actions are expected to improve the negative impacts. → If mitigating measures are contemplated, explain clearly what the measures are, and the extent to which they can be expected to reduce / remove the adverse effects identified.

11. Assessment of overall impacts and any further recommendations

- Make a frank and realistic assessment of the overall extent to which the negative impacts can be reduced or avoided by the mitigating measures. Explain what positive impacts will result from the actions and how you can make the most of these.
- Countervailing considerations: These may include the reasons behind the formulation of the policy, the benefits it is expected to deliver, budget reductions, the need to avert a graver crisis by introducing a policy now and not later, and so on. The weight of these factors in favour of implementing the policy must then be measured against the weight of any evidence as to the potential negative equality impacts of the policy.
- Are there any further recommendations? Is further engagement needed? Is more research or monitoring needed? Does there need to be a change in the proposal itself?